



County of San Diego

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July 29, 2021

Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183

Project Name: Greens Valley Storage Modification
Project Record Numbers: PDS2020-STP-03-026W1
Environmental Log Number: PDS2020-ER-03-08-029A
APN: 188-250-15-00, 188-250-41-00

Lead Agency Name and Address:
County of San Diego
Planning and Development Services
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County Staff Contact:
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Project Location:
The Greens Valley Storage Modification project site is located at 28435 Lizard Rocks Road, in the Valley Center Community Planning area, within the unincorporated San Diego County, CA 92081. The closest cross streets are Lizard Rocks Road and Valley Center Road.

Project Applicant Name and Address:
Greens Valley Center, LLC
910 South El Camino Real, Suite #A-100
San Clemente, CA 92672

General Plan

Community Plan:	Valley Center
Regional Categories:	Village
Land Use Designations:	Limited Impact Industrial (I-1)
Density:	N/A
Floor Area Ratio (FAR)	0.60

Zoning

Use Regulation:	Limited Industrial (M52)
Minimum Lot Size:	6,000 square feet
Special Area Regulation:	Community Design Review (B)

Description of Project:

The proposed project, Greens Valley Storage Modification, consist of a Site Plan (STP) Modification (Mod) and for design review and conformance with the Valley Center Community Plan for a 36,724 square foot (sq. ft.) expansion of an existing 88,253 sq. ft. self-storage facility and associated improvements (project). The following improvements would be required as conditions of approval for the project: project driveway, entry gate, best management practices (BMPS) pursuant to the project's approved Stormwater Quality Management Plan (SWQMP) and Erosion Control Plan, and site landscaping. The applicant is proposing to modify the existing STP (STP-03-025) located on APN 188-250-41-00 to encompass APN 188-250-15-00, a 1.78-acre site with an existing residence and accessory structures that would be removed as part of the project. Grading for the project requires the cut of 9,380 cubic yards and fill of 1,390 cubic yards of material. The project would be served by the Valley Center Municipal Water District and on onsite wastewater treatments system (septic). Fire services would be provided by the Valley Center Fire Protection District (VCFPD), with Valley Center Fire Station #1 the closest VCFPD fire station to the project site located approximately 1.56 miles southwest at 28234 Lilac Rd, Valley Center, CA 92082. Access would be provided by a driveway off of Lizard Rocks Road.

Existing Site Conditions

The project site is located at the bottom of a valley surrounded by mountains and hills. The topography of the site is flat with an overall slope of approximately 4%, varying between approximately 1360 feet above sea level (ASL) and 1382 ASL. The project site climate is within the Transitional Climate Zone in the middle of the Transition Zone. The Transition Zone is a marine-to-desert transition climate which is further inland. The Transition zone features a combination of warmer thermal belts and cold-air basins and hilltops, with occasional marine influence. The climate can vary from heavy fog to dry Santa Ana winds. Onsite vegetation consists of disturbed habitat and urban/development habitat. No special features exist onsite including rock outcropping or geologic features.

Discretionary Actions:

The Discretionary permit for the project includes a STP Mod to construct a 36,724 sq. ft. expansion to an existing self-storage facility onto APN 188-250-15-00. The project is consistent with the Valley Center Community Plan, County of San Diego (County) Zoning Ordinance, and County General Plan.

Overview of 15183 Checklist

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

Summary of Findings

The project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures (see

http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the project qualifies for an exemption because the following findings can be made:

1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.

The project is zoned M52 and has a land use designation of Limited Impact Industrial. The project is for the expansion of an existing storage facility and is consistent with the zoning and General Plan designation for the site.

2. There are no project specific effects which are peculiar to the project or its site, and which the GPU EIR Failed to analyze as significant effects.

The subject property is no different than other properties in the surrounding area, and there are no project specific effects which are peculiar to the project or its site. The project site is located in an area developed with similar development. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to Air Quality, Biological Resources, Cultural Resources, Hydrology and Water Quality, Noise, Transportation and Traffic, and Wildfire. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project.

3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.

The project is consistent with the density and use characteristics of the development considered by the GPU EIR. The GPU EIR considered the incremental impacts of the project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

As explained in the 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

5. The project will undertake feasible mitigation measures specified in the GPU EIR.

As explained in the 15183 exemption checklist below, the project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through project design, compliance with regulations and ordinances, or through the project's conditions of approval.

Signature	July 29, 2021
	Date
Jenna Roady	Land Use/Environmental Planner
Printed Name	Title

CEQA Guidelines §15183 Exemption Checklist

Overview

This checklist provides an analysis of potential environmental impacts resulting from the project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked “Significant project Impact” indicates that the project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked “Impact not identified by GPU EIR” indicates the project would result in a project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the GPU EIR.

A project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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1. AESTHETICS – Would the Project:

a) Have a substantial adverse effect on a scenic vista?

☐☐☐

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

☐☐☐

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

☐☐☐

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

☐☐☐**Discussion**

- 1(a) The GPU EIR concluded this impact to be less than significant with mitigation. A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups. The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

As described in the General Plan Update Environmental Impact Report (GPU EIR; County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

The project site is located within the Valley Center Community Planning area at 28435 Lizard Rocks Road. The closest RCAs to the site are the following: Lancaster Mountain approximately 0.6 mile west of the project site, and Rancho Guejito located approximately 2.5 miles east of the project site. According to the Valley Center Community Plan, Lancaster Mountain is an important RCA along with Keys Canyon and Lilac Creek as a scenic landmark and for biological value due to chaparral, riparian and oak woodland habitat. However, there are no designated trails or trail easements on Lancaster Mountain that would afford substantial views of the project site. The project site is also surrounded by

development and would be similar in bulk and scale. In addition, views of Lancaster Mountain would not be impacted by the project due to height and topography. According to the Valley Center Community Plan, Rancho Guejito is an important RCA along with Pine Mountain and the San Luis Rey River due to its extensive riparian woodland, large growth mixed chaparral and oak woodlands, as well as coniferous tress in the eastern portion. These habitats are recognized as containing important biological value. Due to the distance and elevation difference, the project would not have a substantial adverse effect on this resource.

As previously discussed, the GPU EIR determined impacts on scenic vistas to be less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by Caltrans as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

No Scenic Highways designated by Caltrans are in proximity to the project site. The County General Plan also identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. A designated scenic roadway, Valley Center Road, is located approximately 300 feet north of the project site. The project site can be seen intermittently through vegetation and structures while driving along Valley Center Road. However, as a condition of approval, the project would be required to submit a landscape plan to provide adequate landscaping addressing screening and comply with the requirements of the M52 Zone. The Landscape Plan is required to conform to the conceptual Landscape Plan which includes the following proposed vegetation for screening: a mix of large shrubs along the northern property line; a retaining wall, large shrubs, and trees strategically placed along the northwestern and western property lines. The trees include the California Sycamore, Coast Live Oak, and African Sumac. Additional trees and shrubs are proposed along the eastern and southern property lines. Therefore, due to the proposed vegetation screening, the project would not substantially damage scenic resources within a scenic highway.

As previously discussed, the GPU EIR determined impacts on scenic resources to be less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(c) The GPU EIR concluded this impact to be significant and unavoidable. Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers.

The existing visual character and quality of the project surroundings are characterized by a mix of industrial, commercial, and residential developed lands. At further distances from the project site, various agricultural and equestrian use types exist within the valley. The project within the landscape would not detract from or contract with the existing visual character and/or quality of the surrounding area for the following reasons: conformance with the M52 zone and Valley Center Community Plan, landscape plan as a project condition of approval, and consistency with the surrounding development. The proposed building is required to conform to the development regulations per the County Zoning Ordinance, such as building height and setbacks from property lines. The project would be consistent with surrounding development bulk and scale. Thus, the project would not substantially degrade the existing visual character or quality of the site and its surroundings.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be significant and unavoidable. However, the project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would use outdoor lighting and is located within Zone A of the County of San Diego Light Pollution Code (within twenty miles of the Palomar Observatory). However, the project would not adversely affect nighttime views or astronomical observations because the project would be required to conform to the Zone A Light Pollution Code requirements (Section 51.201-51.209). This would include the utilization of the Zone A lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. The Code was developed by the County in cooperation with lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, the project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

As previously discussed, the GPU EIR determined impacts from light or glare to be significant and unavoidable. However, the project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Aesthetics, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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2. Agriculture/Forestry Resources – Would the Project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?

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b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

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c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

☐☐☐

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

☐☐☐

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

☐☐☐

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. The project site is not underlain by land designated as an important farmland by the Department of Conservation State Farmland Mapping and Monitoring Program (FMMP). The site has been designated as "Other Land". The project site is underlain with Statewide Significance Soils; however, is less than 2 acres in size and has been previously disturbed by a residence, accessory structures, and a driveway. Therefore, the project would not convert important farmland to a non-agricultural use.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project site is zoned M52 and is not considered an agricultural zone. In addition, the closest land under an Agricultural Preserve or a Williamson Act Contract is located approximately 1.3

miles northeast of the project site. The closest active agricultural land is approximately 600 feet northeast across Valley Center Road. According to the County's Guidelines for Determining Significance, Agricultural Resources, most types of agriculture interface conflicts would usually be less than significant if the land uses are separated by 300 feet. Therefore, no land use conflicts would occur to a Williamson Act or Agricultural Preserve.

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(c) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR.

The project site, including any offsite improvements, do not contain any forest lands as defined in Public Resources Code section 12220(g). Therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Cleveland National Forest is located approximately 10.0 miles to the east of the project site. Thus, due to distance, the project would have no impact on the Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones.

As previously discussed, Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the project would have a less than significant impact for the reasons detailed above, the project would not increase impacts identified within the GPU EIR.

- 2(d) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. However, as indicated in response 2(c), the project site, or any off-site improvements, are not located near any forest lands. Therefore, because the project would have a less than significant impact for the reasons detailed above, the project would not increase impacts identified within the GPU EIR.

- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. No agricultural operations are currently taking place on the project site. In addition, no impacts would occur in association with interface conflicts due to project distance from Williamson Act Contracts, Agricultural Preserves, and active agricultural operations. Please refer to response 2(a) and 2(b) for a discussion of on- and off-site agricultural resources and interface conflicts.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the project would have a less than significant impact to Forestry Resources for the reasons detailed above, the project would

not increase impacts identified within the GPU EIR. In addition, the project would be consistent with the analysis within the GPU EIR for Agricultural Resources because it would not increase impacts to Agricultural Resources identified within the GPU EIR.

Conclusion

With regards to the issue area of Agricultural/Forestry Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
3. Air Quality – Would the Project:			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

An air quality assessment titled, *Air Quality Assessment, Green Storage Valley Center Expansion, PDS2019-IC-19-002, Valley Center CA*, was prepared for the project by Jeremy Loudon, March 5, 2021 (Air Quality Assessment). The below responses were based on the analysis provided within the Air Quality Assessment.

Discussion

The following checklist questions are consistent with questions analyzed in the General Plan Update EIR prior to the CEQA Guidelines Appendix G update in 2018. Because the impacts analyzed have not changed, only the question formatting, this analysis has maintained the same questions as analyzed in the General Plan Update EIR for consistency.

- 3(a) The GPU EIR concluded this impact to be less than significant. The RAQS and SIP are based on General Plans within the region and the development assumptions contained within them. The General Plan designates the project site as Limited Impact Industrial. The Project, which is to construct a 36,724 square foot self-storage facility, would be consistent with the General Plan land use designation. Because the proposed project is allowed under the General Plan land use designation, which were used by San Diego Association of Governments (SANDAG) growth projections, it is consistent with the underlying assumptions of the regional air quality strategy (RAQS) and San Diego portion of the State Implementation Plan (SIP). As such, the project would not conflict with either the RAQS or the SIP. Project generated emissions of criteria air pollutants for construction and operations (see Air Quality Assessment) were estimated based on a larger project size of 48,087 square feet¹ and determined that project-generated emissions would be below established screening-level thresholds (SLTs), as addressed under Question 3(b), and would not violate any ambient air quality standards.

As previously discussed, the GPU EIR determined impacts on air quality plans to be less than significant. As the project would have a less than significant for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(b) The GPU EIR concluded impacts to be significant and unavoidable. In general, air quality impacts from land use projects are the result of emissions from area sources (e.g., landscaping, architectural coating, and consumer products), energy (e.g., natural gas), transportation (e.g., on-road mobile sources), and short-term construction activities. The County has identified screening level thresholds (SLTs) which incorporate the San Diego County Air Pollution Control District's (SDAPCD's) established air quality impact analysis trigger thresholds for all new source review (NSR) in SDAPCD Rule 20.2 and Rule 20.3. These SLTs identified in the *County Guidelines for Determining Significance, Air Quality* can be used as numeric methods to demonstrate that a project's total emissions (e.g., stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to local and regional air quality. SLTs for volatile organic compounds (VOCs) are based on the threshold of significance for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which is most appropriate for the San Diego Air Basin). The County's SLTs and SDAPCD's trigger level thresholds were developed in support of State and federal ambient air quality strategies that are protective of human health.

¹ At the time of preparing the Air Quality Assessment by Ldn Consulting, Inc. a larger 48,087 square feet self-storage facility was proposed. After completion of the Air Quality Assessment, the project size was reduced to 36,724 square feet, therefore providing a conservative analysis of air emissions.

As noted, the project was analyzed using a larger project size which included the construction of a 48,087 square foot self-storage facility. The project was subsequently revised to propose a smaller self-storage facility at 36,724 square feet. Due to the smaller project size, the current analysis criteria air pollutants provide a conservative assessment. Potential emissions of criteria air pollutants generated from project construction and operations were estimated by Ldn Consulting, Inc.² Detailed methodology for these estimates is provided in the Air Quality Assessment. For the purposes of the air quality analysis, construction was assumed to occur over an 11-month period starting in 2021. Emissions generated during construction activities would be temporary and localized. Earthwork activities during construction of the project would be balanced on-site. During grading activities, the project would require a minimum watering of the graded areas two times per day to reduce fugitive dust under SDAPCD Rule 55 and would be subject to the requirements of the County of San Diego Grading Ordinance. To further reduce potential impacts generated during the construction phase, the project would require all construction equipment used during grading and site preparation activities to employ Tier 4 engines with diesel particulate filters (DPF) as mitigation. This mitigation measure was identified by the GPU EIR Mitigation Measure 2.5 which requires additional control measures for projects that exceed SLTs. With the application of fugitive dust control measures, emissions of criteria air pollutants during construction activities would be below the County SLTs (see Table 4.1 of the Air Quality Assessment).

The project would be required to comply with the California Energy Commission's most recently updated Building Energy Efficiency Standards (Title 24, Part 6), updated as recently as 2019. Long-term building maintenance would require reapplication of architectural coatings subject to SDAPCD Rule 67.0.1 with an assumed reapplication of 10 percent of total building surface area per year. The project was estimated to generate 96 average daily trips (ADT) as identified within the project traffic study prepared by Darnel and Associates.³ Where Project-specific information was unavailable, default modeling values were used based on the project location, buildout year, and land use type. Daily emissions of criteria air pollutants associated with area, mobile, and energy sources, were estimated in the Air Quality Assessment provided by Ldn Consulting, Inc. The Project would generate daily emissions of criteria air pollutants during operations at levels below County SLTs (see Table 4.3 and 4.4 of the Air Quality Assessment).

Project construction and operational emissions associated with the proposed residential development are not anticipated to exceed the County's construction and operational SLTs, based on the analysis presented in the Air Quality Assessment. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Project Mitigation

Tier 4 Construction Equipment and Diesel Particulate Filters

- Diesel-powered equipment with more than 25 horsepower will be equipped with engines that meet or exceed either EPA or California Air Resources Board (CARB) Tier 4 off-road emissions standards for particulate matter exhaust. An exemption from the Tier 4 requirement may be granted by the County in the event that the

² Ldn consulting, Inc. 2021. Air Quality Assessment, Green Storage Valley Center Expansion. Prepared for Green Global. San Clemente, CA.

³ Darnel and Associates. 2020. Traffic Analysis for Greens Storage Valley Project.

Developer documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from another construction equipment. Before an exemption may be considered by the County, the Developer shall be required to demonstrate that three construction fleet owners/operators in the San Diego region were contacted and that those owners/operators confirmed Tier 4 Final equipment could not be located within the San Diego region.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. However, the project would have a less than significant impact with mitigation for Tier 4 construction equipment and diesel particulate filters. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. The project would contribute to particulate pollution (PM₁₀), nitrogen oxide gases (NO_x), and volatile organic compounds (VOCs) emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above).

San Diego County is presently in non-attainment for the National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively) for ozone (O₃). San Diego County is also presently in non-attainment for concentrations of Particulate Matter less than or equal to 10 microns (PM₁₀) and Particulate Matter less than or equal to 2.5 microns (PM_{2.5}) under the CAAQS. O₃ is formed when VOCs and oxides of nitrogen (NO_x) react in the presence of sunlight. VOC sources include fuel burning; solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ and PM_{2.5} in both urban and rural areas include the following: motor vehicles; wood burning stoves and fireplaces; dust from construction; landfills; agriculture; wildfires; brush/waste burning; and industrial sources of windblown dust from open lands.

The project would contribute PM₁₀, PM_{2.5}, NO_x, and VOC emissions from construction activities; however, the incremental increase would not exceed established SLTs (see Question 3(b) above). Additionally, grading and all other construction activities would be subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55, which require the implementation of dust control measures. The project would generate PM₁₀, PM_{2.5}, and NO_x emissions during project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. Operational emissions would not be anticipated to exceed the County's SLTs.

Cumulative impacts could occur if the most intensive phases of construction for the proposed project occur simultaneous with other intensive phases of proposed projects in close proximity. The most intensive construction phase for the project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM₁₀. As discussed in the Air Quality Assessment, the nearest cumulative construction project would be the Weston Commercial project an estimated 1,300 feet to the east of the project. The project applicant is to coordinate with County Staff to ensure that earthwork and grading activities do not occur simultaneously to the extent feasible. In addition, the project's estimated emissions of

criteria air pollutants, specifically PM₁₀, would be relatively low compared to the County's SLTs during construction activities. Further, due to the highly dispersive nature of particulate matter, a cumulative impact during construction activities would only occur if a project adjacent to the project undergoes simultaneous grading/earthwork activities and emits significantly greater PM₁₀ emissions than the project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur.

The project development is consistent with the County's General Plan, thus operational air emissions are considered to have been accounted for in the GPU EIR. The RAQS and SIP were prepared consistent with the General Plan. Further, as described under Question 3(b), project construction and operations would not result in emissions of criteria air pollutants greater than the County's SLTs. Thus, the project would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is currently in non-attainment.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the project would have a less than significant impact to non-attainment criteria pollutants for the reasons stated above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (Preschool – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The closest sensitive receptors to the Project site are the existing Learning Jungle Preschool and single-family residential units located 200 to 700 feet from the project site.

Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern that would be present during construction activities. DPM is generated from diesel fuel consumption in heavy construction equipment. Abidance to the County of San Diego Grading Ordinance, SDAPCD Rule 55, the application of Tier 4 engines with diesel particulate filters as mitigation, and to a confined construction schedule would reduce emissions and exposure to construction emissions would be temporary and would not expose sensitive receptors to excessive concentrations of air pollutants. The County's SLTs for human health hazards were developed in support of State and federal ambient air quality strategies that are protective of human health.

As described in the Traffic Analysis and Air Quality Assessment, the project would not generate enough daily trips to require an intersection analysis. Therefore, intersection traffic volumes are expected to be low and emission levels would be lower than the CAAQS for CO emissions. Thus, project implementation would not result in the formation of CO hotspots. Impacts to sensitive receptors from CO hotspots would be less than significant.

Furthermore, as indicated in Question 3(b), NAAQS and CAAQS would not be exceeded for both operations and construction and would not expose sensitive receptors to an incremental health risk. In addition, the implementation of Tier 4 construction equipment with diesel particulate filters as mitigation would reduce onsite PM₁₀ from construction

exhaust emissions (i.e., DPM), reducing inhalation cancer risk to a less than significant level.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to sensitive receptors. However, the project would have a less than significant impact with mitigation to sensitive receptors with the implementation of Tier 4 construction equipment and diesel particulate filters. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(e) The GPU EIR determined less than significant impacts from objectionable odors. The project could produce objectionable odors during construction from paving, painting, and heavy equipment operation; however, these substances, if present at all, would be minimal and temporary. Furthermore, the project would be subject to SDAPCD Rule 51, Nuisance Rule, which prohibits emissions of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. The project would result in the future development of a self-storage facility which is not generally associated with the generation of objectionable odors. Therefore, the project would not create objectionable odors affecting a substantial number of people and the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Air Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Air 2.5) would be applied to the project. This mitigation measure, detailed above, would require the project to use Tier 4 equipment with the use of diesel particulate filters.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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4. Biological Resources – Would the Project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

☐☐☐

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

☐☐☐

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☐☐☐

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐☐☐

e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

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A biological resources letter report titled, *Summary Biology Report, Biological Resources, Project Impacts, and Mitigation, The Greens Storage Valley Center Expansion Project, APN 188-250-41 & 188-250-15, Valley Center, PDS2020-STP-03-026W1*, was prepared for the project by Vincent N. Scheidt, January 2021 (Biological Resources Letter Report). The below responses were based on the analysis provided within the prepared Biological Resources Letter Report.

Discussion

4(a) The GPU EIR concluded this impact to be significant and unavoidable. Biological resources on the project site were evaluated in a Biological Resource Letter Report prepared by Vince Scheidt, dated January 2021. The site contains disturbed and urban/developed habitat. No sensitive plant or wildlife species were identified on the site. As a result of this project,

impacts will occur to 1.0 acres of disturbed and 4.7 acres of urban/developed habitat. The site is located within the County' draft North County Multiple Species Conservation Program (MSCP) in land designated as Outside the Pre-approved Mitigation Area (PAMA).

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: breeding season avoidance to prevent brushing, clearing, and/or grading between February 1 and August 31. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

Mitigation Measures

The following list includes the project's mitigation measures and conditions of approval:

MBTA Provisions

- If grading, clearing, brushing, and/or construction activities occur during the breeding seasons for migratory birds and raptors (January 15 – August 31), survey(s) shall be conducted within 7 days prior to project implementation by a qualified biologist to determine whether breeding birds occur within the areas potentially impacted by noise (within 2,600 feet of project impact site).
- If it is determined at the completion of surveys that there are no nesting birds (includes nest building or other breeding/nesting behavior) within the potential impact area, project activities shall be allowed to proceed.
- If surveys determine the presence of active nests, then operation of the following equipment shall not occur within the specified distances from an active nest during the respective breeding season:
 - general construction within 500 feet of raptor nest and 300 feet for all other migratory birds
 - bulldozer within 400 feet
 - rock crusher equipment within 1,350 feet
 - breaker within 500 feet
 - pile driver within 2,600
 - cast-in-drilled holes equipment within 350 feet.
- Construction in the specified distances above shall (1) be postponed until a qualified biologist determines the nest(s) is no longer active or until after the respective breeding season; or (2) not occur until a temporary noise barrier or berm is constructed at the edge of the development footprint and/or around the piece of equipment to ensure that noise levels are reduced to below 60 dBA or ambient noise levels. Decibel output may be confirmed by a County-approved noise specialist and intermittent monitoring would be required by a qualified biologist to ensure that conditions have not changed.
- If project activities are to resume in an area where they have not occurred for a period of seven or more days during the breeding season, an updated survey for avian nesting will be conducted.

With the implementation of the above mitigation measures, the project would not result in a substantial adverse effect on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. However, the project would have a less than significant impact with mitigation for MBTA provisions identified in the GPU EIR as Bio-1.6 and Bio-1.7. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(b) The GPU EIR concluded this impacts to be significant and unavoidable. Based on the Biological Resource Letter Report, no wetlands or jurisdictional waters were found onsite or offsite. No sensitive habitats were identified on the site. As detailed in response a) above, direct and indirect impacts to sensitive natural communities identified in the Resource Protection Ordinance (RPO), Natural Community Conservation Planning, Fish and Wildlife Code, and Endangered Species Act are mitigated.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. As previously discussed in response 4(b), the project site does not contain any riparian habitat. In addition, the project site does not contain any wetland habitats or soils on-site, and there are no Ordinary Water Marks on the property. As such, the project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. Based on a GIS analysis, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report, it was determined that the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal. The site would not assist in local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. The project is located within the draft North County Multiple Species Conservation Program (MSCP) and outside of the South County MSCP. Therefore, it does not require conformance with the Biological Mitigation Ordinance (BMO). The project is consistent with the County's Guidelines for Determining

Significance for Biology, the RPO, and the Migratory Bird Treaty Act (MBTA) with the implementation of mitigation. The project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional, or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans as less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Biological Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Bio-1.6, and Bio-1.7) would be applied to the project. Those mitigation measures, detailed above, requires the project applicant to comply with the MBTA.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
5. Cultural Resources – Would the Project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Two documents were prepared for the project related to Cultural Resources:

- A historical resources study titled, *Historic Resources Study for the Green Storage Valley Expansion Project, San Diego County, California; PDS2020-STP-03-026W1*, was prepared for the project by Justin Castells, January 2021 (Historical Resources Study). The below responses were based on the analysis provided within the prepared Historical Resources Study.
- A cultural resources report titled, *Cultural Resources Study for the Green Storage Valley Expansion Project, San Diego County, California; PDS2020-STP-03-026W1*, was prepared by Shelby Castells, January 2021 (Cultural Resources Report).

The below responses were based on the analysis provided within the prepared Historical Resources Study and Cultural Resources Report.

Discussion

- 5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved historian, Justin Castells, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in an Historical Resources Report titled, *Historic Resources Study for the Green Storage Valley Expansion Project, San Diego County, California; PDS2020-STP-03-026W1*.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist, Shelby Castells, it has been determined that there are no impacts to archaeological resources because they do not occur within the project site. The results of the survey are provided in the Cultural Resources Report titled, *Cultural Resources Study for the Green Storage Valley Expansion Project, San Diego County, California; PDS2020-STP-03-026W1* (January 2021), prepared by Shelby Castells. Shelly Nelson of Saving Sacred Sites served as the Native American monitor during the cultural survey.

The Native American Heritage Commission (NAHC) was contacted for a listing of Native American Tribes whose ancestral lands may be impacted by the project. The NAHC response identified that no sacred sites, on record with the commission, were present on the project property.

Although no resources were identified during site surveys, the potential exists for subsurface deposits. As such, the project will be conditioned with an archaeological and tribal monitoring program.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of a County-approved archaeologist and a Native American monitor and conformance with the County's Cultural Resource

Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5. The project will be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

- Pre-Construction
 - Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during and after construction.
 - Pre-construction meeting to be attended by the Project Archaeologist and Luiseno Native American monitor to explain the monitoring requirements.
- Construction
 - Monitoring. Both the Project Archaeologist and Luiseno Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Luiseno Native American monitor. Both the Project Archaeologist and Luiseno Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources
 - If cultural resources are identified:
 - Both the Project Archaeologist and Luiseno Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project Archaeologist shall contact the County Archaeologist at the time of discovery.
 - The Project Archaeologist in consultation with the County Archaeologist and Luiseno Native American shall determine the significance of discovered resources.
 - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
 - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Luiseno Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
 - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Luiseno Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
 - Human Remains.
 - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.

- Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Luiseno Native American monitor.
 - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- Rough Grading
 - Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
 - Final Grading
 - Final. Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.
 - Cultural Material Conveyance
 - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively have been repatriated to a culturally affiliated tribe.
 - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. As the project would have a less than significant impact with mitigation to historic resources with the implementation of grading monitoring under the supervision of a County-approved archaeologist and a Native American monitor as well as conformance with the County's Cultural Resource Guidelines if resources are encountered, identified by the GPU EIR as mitigation measure Cul-2.5. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(c) The GPU EIR concluded this impact to be less than significant. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources, nor does the site support any

known geologic characteristics that have the potential to support unique geologic features. As previously discussed, the GPU EIR determined impacts on unique geologic features as less than significant. As the project would have a less than significant impacts for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that potentially contain unique paleontological resources. Proposed grading would include more than 2,500 cubic yards of excavation which has the potential to impact fossil deposits. The sensitivity of the geologic formations is marginal; as such, paleontological monitoring by the project contractor will be made a condition of approval.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: conformance with the County's Guidelines for Determining Significance for Paleontological Resource and the Grading Ordinance if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

As previously discussed, the GPU EIR determined impacts on paleontological resources as less than significant with mitigation. As the project would have a less than significant impact with conformance to the County's Guidelines for Determining Significance for Paleontological Resources and Grading Resources identified by the GPU EIR as mitigation measures Cul-3.1, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and archaeological surveys of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. As the project would have a less-than-significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of cultural/paleontological resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-3.1) would be applied to the project. This mitigation measure, detailed above, requires conformance with the County's Guidelines for Determining Significance for Paleontological Resources and the County Grading Ordinance, if resources are encountered.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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6. Energy Use – Would the Project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

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b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

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Discussion

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and Greenhouse Gases (GHG), while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the project.

6(a) The project would increase the demand for electricity at the project site, and gasoline consumption in the project area during construction and operation relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code and 2019 Energy Efficiency Standards would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase and the use of personal vehicles during operations.

Grading and Construction

Grading for the project requires the cut of 9,380 cubic yards and the fill of 1,390 cubic yards of material. During the grading and construction phases of the project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would

not result in wasteful, inefficient, or unnecessary consumption of energy. Any natural gas that may be consumed as a result of the project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in wasteful, inefficient, or unnecessary consumption of energy.

The energy needs for the project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of industrial projects of this size. Additionally, the project is consistent with land use designations under the General Plan and Zoning Ordinance. Thus, the project's energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

Operational

Operation of the project would require gasoline usage for landscape maintenance activities and vehicle trips. Use of natural gas would not be required for the project. Electricity would be required for the building and for lighting. The project would meet the California Code of Regulations Title 24 Standards and Energy Efficiency Standards for energy efficiency that are in effect at the time of construction. The project would also comply with the County's Landscape Ordinance and the water use application using prescriptive compliance option to reduce overall water use onsite. In addition, the project would result in 96 ADT (see Traffic Analysis), is consistent with the County General Plan and Zoning Ordinance, and would not result in wasteful, inefficient or unnecessary petroleum usage throughout project operations.

Over the lifetime of the project, fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models. As such, the amount of petroleum consumed as a result of vehicle trips to and from the project site during operation would decrease over time. State and Federal regulations regarding standards for vehicles (e.g. Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations such as the Zero-Emission Vehicles Mandate and Senate Bill 350 would result in the deployment of electric vehicles which would be powered by an increasingly renewable electrical grid.

The project would use electricity for indoor and outdoor lighting as well as parking lot lighting. Natural gas would not be used for project operations. As previously stated, the project would be designed according to the latest version of Title 24 and Energy Efficiency Standards, which would continue to improve building efficiency over time. The project would not result in energy consumption atypical of industrial uses and would be consistent with the anticipated energy use under the General Plan building of the site; therefore, the project would not be expected to result in wasteful, inefficient or unnecessary energy usage throughout project operations.

A previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The project would not conflict with policies within the GPU related to energy use, nor would it result in the wasteful, inefficient, or unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines.

6b. Many of the regulations regarding energy efficiency are focused on increasing the energy efficiency of buildings and renewable energy generation, as well as reducing water consumption and reliance on fossil fuels. The project includes the following energy conservation measures:

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40% reduction in outdoor use which would reduce energy required for water conveyance.

The project would be consistent with several energy reduction policies of the County General Plan including policies COS-14.1, COS-14.3 and COS-16.3. Additionally, the project would be consistent with sustainable development and energy reduction policies such as policies COS-14.3 and COS-15.4, through compliance with the most recent Title 24 standards and Energy Efficiency Standards at the time of project construction. Therefore, the project would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The project would not conflict with policies within the GPU related to energy use or conflict with or obstruct a state or local plan for renewable energy or energy efficiency as specified within Appendix G of the CEQA Guidelines.

Conclusion

With regards to the issue area of Energy, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

7. Geology and Soils – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

7(a)(i) The GPU EIR concluded this impact to be less than significant. The site is located in the tectonically active southern California area and will therefore likely experience shaking effects from earthquakes. The type and severity of the seismic hazards affecting a site are to a large degree dependent upon the distance to the causative fault, the intensity of the seismic event, and the underlying soil characteristics.

Pursuant to the County Geographic Information System (GIS), the project is not located in a fault rupture hazard zone, identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California. No faults have been mapped within the project site. The closest known fault to the site is approximately 1.6 miles southeast of the project site. However, the identified fault is a "Pre-Quaternary" fault, or a fault with movement older than 1.6 million years. Accordingly, the project is not expected to be impacted by fault surface rupture on the subject site. For a response related to ground shaking, please refer to 7(a)(ii) below.

7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a geotechnical report with proposed foundation recommendation would be required to be approved before the issuance of a building permit as further discussed in response 7(a)(iii). Therefore, compliance with the California Building Code and the County Building Code would ensure that the project would not result in a significant impact.

- 7(a)(iii) The GPU EIR concluded this impact to be less than significant. The project site is located within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. To ensure no impacts would occur, a geotechnical report would be required prior to ground disturbance activities as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction.

Conditions of Approval

The following list includes the project conditions of approval:

Geotechnical Report

- A California Certified Engineering Geologist shall complete a final soils report specific to the preliminary design of the proposed development and submit the final soils report to PDS. The findings shall be reviewed and approved by the Director of the County Department of Planning and Development Services or designee.

- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The site is located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. However, a geotechnical report would be required prior to ground disturbance activities as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. This determination was based on required consistency with all applicable federal, state and local standards and regulations. The project would have a less than significant impact with the incorporation of project conditions for a geological soils report, as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(b) The GPU EIR concluded this impact to be less than significant. According to the Soil Survey of San Diego County, the soils on-site are identified as alfisols [Fallbrook sandy loam, 5 to 9 percent slopes, eroded(FaC2)], that have a soil erodibility rating of severe. However, the project would not result in substantial soil erosion or the loss of topsoil because the project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which would ensure that the project would not result in any unprotected erodible soils, would not significantly alter existing drainage patterns, and would not develop steep slopes. Additionally, the project would be required to implement Best Management Practices (BMPs) per the Priority Development Project Storm Water Quality Management Plan to prevent fugitive sediment. Please see section ten (10) Hydrology and Water Quality for a detailed discussion.

As previously discussed, the GPU EIR determined impacts from soil erosion and topsoil loss to be less than significant. As the project would have a less than significant impact for

the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(c) The GPU EIR concluded this impact to be less than significant. Landslide Susceptibility Areas was discussed in response (a)(iv). As indicated in response (a)(iv), although the site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards, the potential for landslides to impact the proposed development is considered to be low. The project site is relatively flat and is not located at the base of a hill.

Lateral spreading is a principal effect from liquefaction which was discussed in response 7(a)(iii). As discussed in response 7(a)(iii), the project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. However, a Geotechnical Report would be prepared for the project site which would analyze the site for potential lateral spreading and recommend site design measures, if applicable.

Subsidence and collapse may be caused by unstable geological structures or conditions. As stated in response 7(a), impacts to the project site from rupture of a known earthquake fault and strong seismic ground shaking would be mitigated through conformance with the Seismic Requirements outlined within the California Building Code. In addition, a geotechnical report with proposed foundation recommendation would be required to be approved before the issuance of a building permit.

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the project would have a less than significant impact with the incorporation of the standard project condition for a Geotechnical Report, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(d) The GPU EIR concluded this impact to be less than significant. Pursuant to the County GIS, the project site is not underlain by expansive soils. In addition, a Geotechnical Report would be required as a standard condition of approval to implement standard engineering techniques consistent with the California Building Code standards and requirements. As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. The project requires the use of a septic system. However, as a condition of approval, the septic system would require approval by the County Department of Environmental Health prior to issuance of building permits. As such, the project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

As previously discussed, the GPU EIR determined impacts to wastewater disposal systems to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Geology and Soils, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant by adhering to the project conditions of approval, which are consistent with the GPU EIR.

8. Greenhouse Gas Emissions – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A greenhouse gas screening letter titled, *Green Storage Valley Center Expansion Greenhouse Gas Screening Letter – San Diego County*, was prepared for the project by Jeremy Loudon, March 5, 2021 (Greenhouse Gas Analysis). The below responses were based on the analysis provided within the prepared Greenhouse Gas Analysis.

Discussion

- 8(a) The GPU EIR concluded this impact to be less than significant with mitigation. Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 specifies that a lead agency “shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.” Section 15064.4 also provides lead agencies with the discretion to determine whether to assess those emissions quantitatively or to rely on a qualitative analysis or performance-based standards. In addition, the CEQA Guidelines specify that “[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence” (14 CCR 15064.7[c]).

In the absence of a locally adopted numeric threshold by the County of San Diego, projects are to be evaluated according to CEQA Guidelines Section 15064.7(c) by identifying a project-specific threshold. For this analysis, the threshold used to determine potential impacts is the California Air Pollution Control Officers Association (CAPCOA) 900 metric

tons of carbon dioxide equivalent (MTCO_{2e}) per year threshold. The threshold was developed based on various land use densities and future discretionary project types to determine the size of projects that would likely have a less than cumulatively considerable contribution to climate change.

The CAPCOA threshold was developed to ensure capture of 90 percent or more of likely future discretionary developments. The objective was to set the emissions threshold low enough to capture a substantial fraction of future development while setting the emission threshold high enough to exclude small development projects that would contribute a relatively small fraction of cumulative statewide GHG emissions. GHG emissions associated with 11,000 square feet of retail use were estimated by CAPCOA and found to be 900 MT CO_{2e}, establishing the basis for demonstrating that cumulative reductions are being achieved across the state for commercial development.

CAPCOA's 900 MTCO_{2e} per year threshold was developed in order to meet Assembly Bill (AB) 32 State target of reducing emissions to 1990 levels by year 2020. Since adoption of this threshold, Senate Bill (SB) 32 was passed to set a revised statewide reduction target to reduce emissions to 40 percent below 1990 levels by year 2030. Though the CAPCOA threshold does not consider the reduction targets set by SB 32, the CAPCOA threshold was developed with an aggressive project-level GHG emission capture rate of 90 percent.

As compared to similar mass emissions thresholds adopted by other regional air districts the CAPCOA 900 MTCO_{2e} threshold is relatively conservative and could be used to support cumulative impact determination beyond 2020. In April 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published updated project screening levels and determined that projects estimated to generate less than 1,100 MTCO_{2e} per year would not result in a significant, cumulative impact.⁴ This threshold was developed to demonstrate compliance with the statewide reduction targets in 2030 and the threshold was determined by SMAQMD to capture 98 percent of total GHG emissions.

The CAPCOA threshold of 900 MTCO_{2e} represents a more stringent screening level than has been approved by other air districts in compliance with 2030 statewide reduction targets. Due to the aggressive GHG emission capture rate, the CAPCOA threshold would still act as a viable threshold to reduce project GHG emissions proposed after 2020 and meet SB 32 targets. Furthermore, as State legislative requirements such as Building Energy Efficiency Standards and transportation-related efficiency measures become increasingly more stringent overtime, future project GHG emissions would be reduced helping to meet State emission reduction targets.

The Project is estimated to generate 293 MTCO_{2e} per year during operations. When combined with a 30-year amortization of construction emissions of 11 MTCO_{2e} per year (consistent with methodology from the SCAQMD⁵), total annual project GHG emissions were estimated to be 305 MTCO_{2e} (see Greenhouse Gas Analysis). Thus, the Project

⁴ Sacramento Metropolitan Air Quality Management District (SMAQMD). 2020. Greenhouse Gas Thresholds for Sacramento County. Available: <http://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf>. Accessed March 18, 2021.

⁵ South Coast Air Quality Management District. 2008. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. Available: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed March 18, 2021.

would not generate GHG emissions in excess of the 900 MTCO₂e per year CAPCOA threshold and the project's impacts related to GHG emissions would be less than significant.

As previously discussed, the GPU EIR determined impacts to be less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 8(b) The GPU EIR concluded this impact to be less than significant. The project is consistent with the County's General Plan land use designation of Limited Impact Industrial. Through its goals, policies, and land use designations, the County's General Plan aims to reduce County-wide GHG emissions. Furthermore, the County's General Plan growth projections informed the development of the San Diego Association of Governments (SANDAG) 2050 Regional Transportation Plan and Sustainable Community Strategy (RTP/SCS). SANDAG's RTP/SCS is the region's applicable plan for reducing GHG emissions and is consistent with State GHG emissions reductions set by the California Air Resources Board (CARB). Because the proposed Project is consistent with the General Plan land uses, it is also consistent with State GHG emission reduction targets as identified in the SANDAG RTP/SCS.

The County's GHG emissions inventory in the RTP/SCS determined that mobile emissions make up a majority of the unincorporated County's GHG emissions. Because the Project's proposed land uses are consistent with the County's General Plan land use designation, the Project would not conflict with the General Plan or RTP/SCS and would not result in growth beyond what was assumed in the regional growth forecasts. Therefore, the Project's impacts related to GHG emissions would be less than significant.

As previously discussed, the GPU EIR determined impacts to applicable regulation compliance to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Global Climate Change, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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9. Hazards and Hazardous Materials –

Would the Project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

☐☐☐

b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

☐☐☐

c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

☐☐☐

d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

☐☐☐

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

☐☐☐

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

☐☐☐

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

☐☐☐

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

☐
☐
☐

A fire protection plan titled, *Subject: Fire Protection Plan – Letter Report, 28435 Lizard Rocks Road, Valley Center, CA 92082*, was prepared for the project by David Oatis, dated March 10, 2021 (Fire Protection Plan). The below response for 9(g) is based on the analysis provided within the prepared Fire Protection Plan.

Discussion

9(a) The GPU EIR concluded this impact to be less than significant. The project would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of hazardous substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity.

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(b) The GPU EIR determined impacts from hazards to schools to be less than significant. The project is located within one-quarter mile of an existing or proposed school: Learning Jungle Preschool (approximately 700 feet from the project site). However, as discussed in response 9(a), the project would not store, transport, emit or dispose hazardous substances. The project is for the expansion of an existing self-storage facility. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school.

As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. Because the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(c) The GPU EIR concluded this impact to be less than significant. The site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances. Therefore, the project would not result in a release of hazardous substances and would not create a significant hazard to the public or the environment.

As previously discussed, the GPU EIR determined impacts from existing hazardous materials sites to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within an Airport Safety Zone, Avigation Easement, Overflight area, within two miles of a public airport, or within a Federal Aviation Administration (FAA) Height Notification Surface Area. In addition, the project is consistent with the County Zoning Ordinance, allowing a maximum height of 35-feet. The project would not result in a safety hazard for people residing or working in the project area.

As previously discussed, the GPU EIR determined impacts on public airports to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not within one mile of a private airstrip. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The GPU EIR concluded this impact to be less than significant with mitigation. The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

- 9(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN:
The project is not within the San Onofre emergency planning zone.

- 9(f)(iii) OIL SPILL CONTINGENCY ELEMENT:
The project is not located along the coastal zone.

- 9(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:

The project would be served by the Valley Center Municipal Water District with the ability to serve the project. In addition, the project is consistent with the County General Plan. Therefore, the project would not alter major water or energy supply infrastructure which could interfere with the plan.

- 9f)(v) DAM EVACUATION PLAN:

The project site is not located within an identified dam inundation zone. Additionally, the development would not constitute a "Unique Institution" such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(g) The GPU EIR concluded this impact as significant and unavoidable. The project is located in a very high fire hazard severity zone. However, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires because the project would comply with the regulations relating to emergency access, fuel modification, and water supply, specified in the Consolidated Fire Code, as described in the Fire Protection Plan prepared for the project. The project only has one interface to undeveloped land (west). This area is maintained in accordance with the County of San Diego Defensible Space Ordinance. The project site will not have any structures within 90 feet of the property line on the east site. According to the Fire Protection Plan, the combination of building construction, lack of fuels in the interface and overall lack of continuous wildland fuels in the upwind area, produce a defensible space which is more than adequate to protect the project site in the event of a wildfire in the adjacent properties. In addition, the closest VCFPD fire station (Valley Center Fire Station #1) is located 1.56 miles southwest from the project site at 28234 Lilac Road, Valley Center, CA 92082. The project would meet the required travel response time of 5 minutes.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. However, the project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(h) The GPU EIR concluded this impact as less than significant. The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. There are none of these uses on adjacent properties. Therefore, the project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

As previously discussed, the GPU EIR determined impacts from vectors to be less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Hazards and Hazardous Materials, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant by adhering to the project conditions of approval, which are consistent with the GPU EIR as described above.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Expose people or structures to a significant risk of loss, injury or death involving flooding? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| m) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Two technical studies were prepared for the project related to hydrology and water quality:

- A Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) titled *County of San Diego Stormwater Quality Management Plan (SWQMP) For Priority Development Projects (PDPs)*, was prepared for the project by Gregory Cooke, dated May 27, 2021 (PDP SWQMP).
- A drainage study titled, *Drainage Study for GS Valley Expansion, 28435 Lizard Rocks Road, Valley Center, California 92082 (in unincorporated area of San Diego County)*, was prepared for the project by Gregory Cooke, dated May 27, 2021 (Drainage Study).

The below responses were based on the analysis provided within the prepared PDP SWQMP and Drainage Study.

Discussion

- 10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development projects have the potential to generate pollutants during both the construction and operational phases. For the project to avoid potential violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, storm water management plans are prepared for both phases of the development project.

During the construction phase, the project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization and hydroseeding on disturbed slopes; County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and waste management.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009. During the post-construction phase, as outlined in the SWQMP, the project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

Conditions of Approval

The following list includes the project conditions of approval:

Storm Water Pollution Prevention Plan

- A SWPPP would be prepared in accordance with the National Pollutant Discharge Elimination Systems Construction General Permit adopted by the State Water Resources Control Board.

The project's conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the project would not create cumulatively considerable water quality impacts and addresses human health and water quality concerns. Therefore, the project would not contribute to a cumulatively considerable impact to water quality from waste discharges.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the project would have a less than significant impact to water quality standards with the implementation of project conditions as detailed above. The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2, Hyd-1.3, and Hyd-1.5. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The project lies in the Rincon hydrologic subarea, of the lower San Luis Rey area, within the San Diego hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion of this watershed is impaired. Constituents of concern in the lower San Luis Rey watershed include benthic community effects, bifenthrin, chloride, indicator bacteria, nitrogen, phosphorus, total dissolved solids, and toxicity. The project could contribute to release of these pollutants; however, the project would comply with the WPO (identified as GPU EIR mitigation measure Hyd-1.2) and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the project would have a less than significant impact with mitigation (Hyd-1.2, Hyd-1.3 and Hyd-1.5) to water quality standards and requirements. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances would ensure that project impacts are less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the project would have a less-than significant impact with mitigation to water quality standards and requirements and groundwater supplies and recharge (Hyd-1.2, Hyd-1.3, and Hyd-1.5). Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would obtain its water supply from the Valley Center Municipal Water District. The District obtains water from surface reservoirs or other imported sources. The project would not use any groundwater and would not involve operations that would interfere substantially with groundwater recharge.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. The project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The site exhibits slightly sloped topography. Elevations of the site range from 1382 feet ASL at the northeastern corner to 1361 feet ASL at the southwestern corner. Under the existing condition, the stormwater runoff generated from APN 188-250-15-00 where the expansion is proposed, drains southwesterly over land into Lizard Rocks Road. This drainage is intercepted by the bioretention swale and drainage inlets near the southwest corner. The existing development area drainage from APN 188-250-41-00 and offsite areas, drains westerly onto the lot into a concrete ditch. The site drainages all flow in an existing concrete channel along the southerly property line and discharge through existing wall opening into Cole Grade Road approximately 250 feet west of the site. In the proposed project condition, a new underground detention system in conjunction with a manhole is proposed to capture runoff from APN 188-250-15-00. For APN 188-250-41-00, the existing storm chamber will remain while the above-ground detention basin is proposed to be located underground. The points of discharge remain the same as in the existing condition.

The project would not substantially alter the existing drainage pattern in a manner which would result in substantial erosion or siltation because storm water management plans are prepared for both the construction and post-construction phases of the development project as described in response 10(a). During the construction phase, the project would prepare and implement a SWPPP. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009. During the post-construction phase, the project would be required to comply with the PDP SWQMP, requiring implementation of site design, source control and structural BMPs. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. The Department of Public Works would ensure that these plans are implemented as proposed. In addition, the project would be required to comply with the County Grading ordinance, the County RPO, conform to the natural topography, not significantly alter dominant physical characteristics of the site, as well as maximize natural drainage and topography when conveying stormwater. These aforementioned measures were identified as Hyd-3.1, Hyd-3.2 and Hyd-3.3 by the GPU EIR. Therefore, it has been determined that the project would not result in significantly increased erosion or sedimentation potential and would not alter any drainage patterns of the site or area on- or off-site.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the project would have a less than significant impact to erosion or siltation with mitigation (Hyd-1.2, Hyd-1.3, Hyd-1.5, Hyd-3.1, Hyd-3.2 and Hyd-3.3). Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Hydraulic Study determined that the project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. The analysis was based off of modeling through Bentley FlowMaster V8i software.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The project would have a less than significant for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Hydraulic Study prepared for the project, the project would not exceed the capacity of existing or planner storm water drainage systems. Therefore, the project design would not result in exceeding the capacity of storm water drainage systems.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The project would have a less than significant for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in response 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the project would have a less than significant impact to water quality standards with the implementation of GPU EIR mitigation measures Hyd-1.2, Hyd-1.3 and Hyd-1.5. Therefore, the project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. According to the Hydraulic Study, the project would not be placed within a 100-year flood hazard area. In addition, the project site is not located within a floodplain or floodway.

As previously discussed, the GPU EIR determined impacts to place housing within a 100-year flood hazard area as less than significant with mitigation. The project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. No 100-year flood hazard areas were identified on the project site. Therefore, the project would not place housing or structures within a 100-year flood hazard area that would impede or redirect flood flows.

As previously discussed, the GPU EIR determined impacts from impeding or redirecting flood flows as less than significant with mitigation. The project would have a less than significant for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(k) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in response 10(i) and 10(j), the project site is not located within a 100-year flood hazard area, floodway or floodplain. Therefore, the project would not expose people or structures to a significant risk of loss, injury or death involving flooding.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area and emergency response and evacuation plans as less than significant with mitigation. The project would have a less-than-significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(l) The GPU EIR concluded this impact to be less than significant with mitigation. The County Office of Emergency Services maintains Dam Evacuation Plans for each dam operational area. These plans contain information concerning the physical situation, affected jurisdictions, evacuation routes, unique institutions and event responses. If a “unique institution” is proposed, such as a hospital, school, or retirement home, within dam inundation area, an amendment to the Dam Evacuation Plan would be required.

The project site is not located within a dam inundation area. In addition, the development would not constitute a “Unique Institution” such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans. The project would not interfere with the adopted Dam Evacuation Plan. Therefore, impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from dam inundation and flood hazards and emergency response and evacuation plans as less than significant with mitigation. The project would have a less than significant impact for the reasons detailed

above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(m) The GPU EIR concluded this impact to be less than significant with mitigation.

10(m)(i) SEICHE: The project site is not located along the shoreline of a lake or reservoir.

10(m)(ii) TSUNAMI: The project site is not located in a tsunami hazard zone.

10(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 7(a)(iv). In addition, the project would be required to comply with the County Grading ordinance, the County RPO, and be developed away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, as well as maximize natural drainage and topography when conveying stormwater. These aforementioned measures were identified as Hyd-3.1, Hyd-3.2 and Hyd-3.3 by the GPU EIR.

As previously discussed, the GPU EIR determined impacts from seiche, tsunami and mudflow hazards to be less than significant with mitigation. However, the project would have a less than significant impact with project condition for a geological soils report identified by the GPU EIR in section 2.6.3.1, Federal, State and Local Regulations, and Existing Regulatory Processes, Liquefaction as well as mitigation identified in the GPU EIR as Hyd-3.1, Hyd-3.2, Hyd-3.3. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Hydrology and Water Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible conditions identified in the GPU EIR and mitigation measures contained within the GPU EIR (Hyd-1.2, Hyd-1.3, Hyd-1.5, Hyd-3.1, Hyd-3.2, and Hyd-3.3) would be applied to the project. These mitigation measures, as detailed above, requires the project to conform with the WPO, the RPO, the Grading Ordinance, the Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources, implement LID standards, prepare a geological soils report, conform to the natural topography, not significantly alter dominant physical characteristics of the site, as well as maximize natural drainage and topography when conveying stormwater.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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11. Land Use and Planning – Would the Project:

a) Physically divide an established community?

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b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

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Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project would not physically divide an established community. The project site is surrounded by development including industrial, commercial, and residential uses. The development proposed at the site is similar to the surrounding development and is consistent with the County General Plan use regulations.

As previously discussed, the GPU EIR determined impacts from physically dividing an established community as less than significant with mitigation. However, the project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

11(b) The GPU EIR concluded this impact to be less than significant. The project site is zoned M52, with a minimum lot size of 6,000 sq. ft., and has a General Plan designator of Limited Impact Industrial. The project would expand an existing 88,253 square foot self-storage facility by 36,724 square feet. The project is consistent with the County Zoning Ordinance as well as the General Plan, certified by the GPU EIR. In addition, the project is consistent with the Lakeside Community Plan policies and goals such as to require commercial and industrial land uses “to minimize adverse impacts, such as noise, light, traffic congestion, odors, dust, etc.” The project would not result in any impacts to these subject areas as described in this environmental checklist. The project is also consistent with an industrial policy to require “industrial development to be clean, non-polluting, and complementary to Lakeside’s rural environment.” The project is for a self-storage facility that is non-polluting, and includes a landscape plan to blend into the rural landscape. The Lakeside Community Plan also prioritized existing industrial uses and included an industrial policy to “allow existing industries to remain and expand in lakeside”. The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, and regulations as less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the

analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Land Use and Planning, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant. Therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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12. Mineral Resources – Would the Project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

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b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

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12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of “Inconclusive” (MRZ-4), indicating that further exploration is needed. However, the project site is surrounded by development which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 12(b) The GPU EIR concluded this impact to be significant and unavoidable. The project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25). The project site is not located in an area that has MRZ-2 designated lands, nor is it located within 1,300 feet of such lands. Therefore, no potentially significant loss of availability of a known mineral resource would occur as a result of the project.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Mineral Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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13. Noise – Would the Project:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

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b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

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c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

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d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

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e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

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f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

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A noise analysis titled, *Focused Noise Analysis, Green Storage Valley Center Expansion, San Diego County Record ID: PDS2020-STP-03-026W1*, was prepared for the project by Amy Hool, February 17, 2021 (Noise Analysis). The below responses were based on the analysis provided within the Noise Analysis.

Discussion

13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the project site consists of residences, agricultural uses, and vacant land. The project will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element

The General Plan Noise Element Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dBA are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Based on the review of the County's noise contour maps, the project is not expected to expose existing or planned noise sensitive areas to noise in excess of 60 dBA.

Noise Ordinance – Section 36.404

The project would comply with the Noise Ordinance Section 36-404 for non-transportation noise generated by the project. The project site is zoned M52 that has a one-hour average sound limit of 70 dBA daytime and nighttime. The adjacent properties are zoned M52, General Impact Industrial (M54), General Commercial (C36), and Rural Commercial (C40). M52 and M54 are both subject to the 70 dBA daytime and nighttime sound level limit. The C36 and C40 zones are subject to the arithmetic mean noise limit levels of 65 dBA daytime and 62.5 dBA nighttime. The primary noise source from the project would be from the Heating Ventilating and Air Conditioning (HVAC) unit. The Noise Report prepared by Eilar Associated, Inc. and dated February 17, 2021, demonstrated that the noise levels from the units would comply with the Noise Ordinance, Section 36.404 with the use of four 5-Ton roof-top unit model "Carrier 48VL-A60", or equivalent model (Sound Power Level 76 dBA). To ensure the project complies with the Noise Ordinance, the project would be conditioned that in the event that a louder equipment is proposed, a project Modification or Minor Deviation subject to CEQA would be required to demonstrate compliance with the County's Noise Ordinance. This measure was identified by the GPU EIR as Noi-4.2.

Conditions of Approval

The following list includes the project conditions of approval:

Noise Requirement (HVAC)

- In order to reduce the exposure to noise levels in excess of standards established by the County of San Diego General Plan Noise Element (Table N-1 & N-2), and to mitigate the noise exposure of exterior noise sensitive land uses below levels of significance as evaluated in the County Noise Guidelines for Determining Significance, the project must adhere to the following design measures and shall be implemented on the building plans:
 - On the building plans, please specify the proposed HVAC units as “5-Ton roof-top unit model Carrier 48VL-A60 or an equivalent model, with Sound Power Level of 76 dBA.

Noise Ordinance – Section 36-410

The project would comply with the Noise Ordinance Section 36-410 for construction noise. The project would not generate construction noise in excess of Noise Ordinance standards with the implementation of standard conditions. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM. These measures were identified by the GPU EIR as Noi-4.2.

Project Conditions of Approval

The following list includes project’s conditions of approval:

Temporary Construction Noise

- The project shall comply with the following temporary construction noise control measures:
 - Turn of equipment when not in use.
 - Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured to prevent rattling and banging.
 - Use equipment with effective mufflers.
 - Minimize the use of back-up alarms.
 - Equipment staging areas should be placed at locations away from noise sensitive receivers.

With the incorporation of the aforementioned conditions of approval, the project would comply with the General Plan Noise Ordinance.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. The project would have a less than significant impact with the incorporation of standard conditions of approval. The aforementioned conditions were identified within the GPU EIR as mitigation measure Noi-4.2. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project consists of demolishing existing structures and construction of one new storage building. No residences or other noise sensitive land use type are proposed. In addition, the Noise Analysis found that the project is not expected to include any significant vibration including

equipment, such as pile driving or heavy soil compaction. As these types of equipment will not be present, excessive levels of groundborne vibration and groundborne noise levels are not expected to be received by any persons.

As previously discussed, the GPU EIR determined impacts from excessive groundborne vibration to be less than significant with mitigation. However, the project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(c) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 13(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards with the incorporation of mitigation measures listed in response 13(a) identified by the GPU EIR as Noi-4.2. In addition, the project is not expected to expose existing or planned noise sensitive areas to noise 10 db CNEL over existing ambient noise levels. Therefore, the propose project will not cause any significant impacts to any existing or future noise sensitive land uses.

As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. However, the project would have a less than significant impact with the incorporation of mitigation measures listed in response 13(a). Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Noise Analysis, project operations and general construction noise would not exceed the noise standards of the County of San Diego Noise Ordinance with the implementation of standard conditions of approval listed in response 13(a). Construction operations would occur only during permitted hours of operation. Lastly, the project would not operate construction equipment in excess of 75 dB for more than 8 hours during a 24-hour period.

As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. However, the project would have a less than significant impact with project conditions of approval listed in response 13(a). Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within an Airport Land Use Compatibility Plan or within 2 miles of a public airport or public use airport. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within a one-mile vicinity of a private airstrip. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Noise, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Noi-4.2) have been incorporated into the project as conditions of approval. The mitigation measure, as detailed above, requires the project applicant to comply with the County Noise Ordinance.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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14. Population and Housing – Would the Project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

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b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

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c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

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Discussion

14(a) The GPU EIR concluded this impact to be less than significant. The project site is designated by the General Plan as Limited Impact Industrial and is Zoned M52. Development of the project is consistent with the Zoning Ordinance and the land use regulations of the General Plan. The project is for the expansion of an existing self-storage facility. As such, the project would not introduce substantial unplanned population growth in the area.

As previously discussed, the GPU EIR determined impacts from population growth to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

14(b) The GPU EIR concluded this impact to be less than significant. The project would remove one residence and accessory structures from the project site which is vacant. Therefore, the project would not displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of housing to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

14(c) The GPU EIR concluded this impact to be less than significant. As indicated in response 14(b), the project would only remove one residential structure that is not occupied. Therefore, the project would not require the displacement any people.

As previously discussed, the GPU EIR determined impacts from displacement of people to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Population and Housing, the following findings can be made:

- 1. No peculiar impacts to the project or its site have been identified.
- 2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
- 3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
- 4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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15. Public Services – Would the Project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?

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Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. Fire protection service would be provided by the Valley Center Fire Protection District approximately 1.56 miles from Valley Center Fire Station #1. Sewer and water services would be provided by the San Diego County Sanitation District Lakeside Service Area. The proposed project is for the expansion of a self-storage facility. Project facility availability forms are required to be submitted prior to building permit issuance indicating the aforementioned service district's ability to serve the project. Therefore, the project would not result in adverse physical impacts to public services.

As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as less than significant with mitigation while school services remained significant and unavoidable. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Public Services, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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16. Recreation – Would the Project:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

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b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

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Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project is for the expansion of an existing self-storage facility. Therefore, the project would not increase the use of existing neighborhood and regional parks or other recreational facilities.

As previously discussed, the GPU EIR determined impacts related to deterioration of parks and recreational facilities to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not include recreational facilities or require the construction or expansion of recreational facilities such as parks.

As previously discussed, the GPU EIR determined impacts related to construction of new recreational facilities to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Recreation, the following findings can be made:

- 1. No peculiar impacts to the project or its site have been identified.
- 2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
- 3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
- 4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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17. Transportation and Traffic – Would the Project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

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|--|--------------------------|--------------------------|--------------------------|
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

A traffic analysis titled, *Subject: Traffic Analysis for Greens Storage Valley Project at 24835 Lizard Rocks Road in the Valley Center area of San Diego County. APN#188-250-15*, was prepared for the project by Billy Darnell on January 21, 2021 (Traffic Analysis). The below responses were based on the analysis provided within the Noise Analysis.

Discussion

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego previously adopted "Guidelines for Determining Significance and Report and Format and Content Requirements for Transportation and Traffic" in 2006, with revisions and modifications approved in 2007, 2009, 2010, and 2011. Revisions and modification focused primarily on metrics related to vehicle delay through Level of Service (LOS). These Guidelines presented an evaluation of quantitative and qualitative analyses and objective and predictable evaluation criteria and performance measures for determining whether a land development project or a public project like a community plan has a significant traffic impact on the environment pursuant to the State California Environmental Quality Act (CEQA), as well as a determination of the required level of CEQA analysis.

Senate Bill 743 (SB 743) was signed into law on September 27, 2013 and changed the way that public agencies evaluate transportation impact under CEQA. A key element of this law is the elimination of using auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions." According to the law, "traffic congestion shall not be considered a significant impact on the environment" within CEQA transportation analysis. The Transportation Study

Guidelines have been adopted by the County Board of Supervisors on June 24, 2020 to address SB 743.

In response, the Governor's Office of Planning and Research (OPR) updated CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. Based on input from the public, public agencies, and various organizations, OPR recommended that Vehicle Miles Traveled (VMT) be the primary metric for evaluating transportation impacts under CEQA. VMT measures the number of vehicle trips generated and the length or distance of those trips.

SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., General Plan), studies, congestion management and transportation improvements, but these metrics may no longer constitute the basis for transportation impacts under CEQA analysis as of July 1, 2020. For example, in the County, the General Plan identifies LOS as being a required analysis, and even though it will no longer be a requirement of CEQA, unless the General Plan is amended, LOS will continue to be analyzed as part of project review.

The project would expand an existing 88,253 square foot self-storage facility by 36,724 square feet. Pursuant to the adopted Transportation Study Guidelines Section 2.2, Table 1, the project meets the CEQA VMT screening criteria as a locally serving project. Projects that are locally serving would not be required to prepare a CEQA VMT analysis and would not conflict with an applicable plan, ordinance or policy related to VMT.

The Traffic Analysis prepared for the project analyzed the project's potential impacts to LOS. The Traffic Analysis trip generation for the project indicates that the project will generate 96 daily trips, with 6 AM peak hour trips and 9 PM peak hour trips. The Transportation Study Guidelines have also adopted thresholds for determining when a project may have a significant impact and must prepare a Local Mobility Analysis based on project type and number of trips, as determined by Section 2.2, Table 2. Because the project is consistent with the County General plan and would result in less than 250 daily trips, a Local Mobility Analysis would not be warranted for the project and no impacts would occur. Therefore, the project would not conflict with an applicable plan, ordinance or policy related to local mobility.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. However, the project would have a less than significant impact to County traffic and LOS standards as detailed above. In addition, the project would not conflict with SB 743 because it is considered a locally service project. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(b) The GPU EIR concluded this impact to be significant and unavoidable. The designated congestion management agency for the County is the San Diego Association of governments (SANDAG). In October 2009, the San Diego region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process.

Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020 that sets forth specific considerations for evaluating a project's transportation impacts. Generally, VMT is the most appropriate measure of transportation impacts. As discussed in 17(a), the project would not result in an impact to VMT because the project is considered locally serving. In addition, the project would not conflict with GPU Policy M-2.1 because the project trips are below the Transportation Study Guideline's threshold for requiring a Local Mobility Analysis. Therefore, the project would not conflict with an applicable congestion management program.

As previously discussed, the GPU EIR determined impacts on significant and unavoidable impacts to unincorporated County traffic and LOS standards. However, the project would have a less than significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project is not located within an Airport Safety Zone, Avigation Easement, Overflight area, within two miles of a private or public airport, or within a Federal Aviation Administration (FAA) Height Notification Surface Area. The project is also consistent with the County Zoning Ordinance, allowing a maximum height of 35-feet. Because of the project would not reach a significant height in elevation (i.e., 200 feet), and due to its location, the project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks.

As previously discussed, the GPU EIR determined impacts on public airports to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(d) The GPU EIR concluded this impact to be significant and unavoidable. The project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The project will provide adequate sight distance from the proposed private-access driveway.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. However, the project would have a less-than-significant impact for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Lakeside Fire Protection District has reviewed the project and the Fire Protection Plan and have determined that there is adequate emergency fire access. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the project would implement the Building and Fire codes to ensure emergency fire apparatus accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. As the project would have a less than significant impact for

the reasons detailed above and with the implementation of GPU EIR Mitigation Measure Tra-4.2, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Transportation and Traffic, the following findings can be made

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Tra-4.2) would be applied to the project. The mitigation measures, as detailed above, would require consistency with the Building and Fire Codes to ensure emergency fire apparatus accessibility.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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18. Utilities and Service Systems – Would the Project:

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|--|--------------------------|--------------------------|--------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A project facility availability form is required prior to issuance of a building permit indicating that the San Diego County Sanitation District Lakeside Service Area has adequate capacity to serve the project. Therefore, the project would be consistent with the wastewater treatment requirements of the RWQCB as determined by the authorized, local public agency.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis

provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(b) The GPU EIR concluded this impact to be less than significant with mitigation. A project availability form is required to be submitted prior to building permit issuance for water and sewer services from the San Diego County Sanitation District Lakeside Service Area that indicates this district has adequate capacity to serve the project. Therefore, no impacts will occur.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be less than significant with mitigation. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The project involves new storm water drainage facilities (onsite basins). However, these basins would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

As previously discussed, the GPU EIR determined impacts on stormwater drainage facilities to be less than significant. As the project would have a less than significant impact for the reasons detailed above, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. Prior to obtaining a building permit, a Service Availability Form from the San Diego County Sanitation District Lakeside Service Area would be required, indicating the district's ability to service the project. If additional conditions are required by the San Diego County Sanitation District, these will be required prior to building permit issuance. Therefore, no impacts would occur.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be significant and unavoidable. However, the project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(e) The GPU EIR concluded this impact to be less than significant with mitigation. A service availability letter from the San Diego County Sanitation District Lakeside Service Area is required prior to building permit issuance, indicating the district's ability to service the project. Therefore, no impacts will occur.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities be less than significant with mitigation. However, the project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(f) The GPU EIR concluded this impact to be less than significant. All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted

active landfills in San Diego County with remaining capacity to adequately serve the project. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(g) The GPU EIR concluded this impact to be less than significant. The project would deposit all solid waste at a permitted solid waste facility. Therefore, the project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Utilities and Service Systems, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
19. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A fire protection plan titled, *Fire Protection Plan – Letter Report, 38435 Lizard Rocks Road, Valley Center, CA 92082*, was prepared for the project by Gene Begnell, March 10, 2021 (Fire Protection Plan). The below responses were based on the analysis provided within the Fire Protection Plan.

Discussion

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The guidelines for determining significance stated: the proposed General Plan Update would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did address these issues within the analysis; however, they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

- 19(a) The project would expand an 88,253 square-foot existing self-storage facility by 36,724 square feet. The project site is located within the very high fire hazard severity zones (FHSZ). The project site would be serviced by the Lakeside Fire Protection District, located approximately 1.56 miles from Fire Station #1. The project would be required to be consistent with the County Consolidated Fire Code and Building Code, identified by the GPU EIR as Haz-4.3. The Lakeside Fire Protection District approved the Fire Protection Plan prepared for the project on March 17, 2021. In addition, the project is consistent with the County Zoning Ordinance and General Plan. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the project would have a less than significant impact for the reasons detailed above and with the incorporation of the GPU EIR mitigation measure Haz-4.3. This measure requires the project to comply with the Fire Code and Building Code. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. As indicated above in response a), the project is located within a very high FHSZ. However, the majority of the County is in the High and Very High FHSZ. Accordingly, the County has implemented fire safety measures depending on specific factors, such as location, vegetation, etc. The project has prepared a Fire Protection Plan which has been approved by the Lakeside Fire Protection District. The project would also be required to meet applicable fire measures such as fire sprinklers, site inspections, premises identification, fire apparatus access, access road requirements, fire hydrants, identified by the GPU EIR as Haz-4.3, and would require brush management, identified by the GPU EIR Haz-4.2. Additionally, the Lakeside Fire Protection District has approved the Fire Protection Plan prepared for the project. The closest fire station is located approximately 1.56 miles from the project site. The project would not exacerbate wildfire risk due to slope, prevailing winds or other factors because the project site would not develop any steep slopes, does not contain any significant geological features that would influence wildland fire behavior, and is surrounded by development.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the project would have a less than significant impact for the reasons detailed above and with the incorporation of the GPU EIR mitigation measures Haz-4.2 and Haz-4.3. The project would be consistent with the GPU EIR mitigation measure Haz-4.3 for compliance with the Building and Fire Code and the project has incorporated

the GPU EIR Mitigation Measure Haz-4.2 for brush management as a project design feature. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be significant and unavoidable. The project would not require the installation or maintenance of the following associated infrastructure: private roads, fuel breaks, and sewer/water connections. All infrastructure associated with the project has been incorporated within this analysis. Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the project would have a less than significant impact for the reasons detailed above and with the incorporation of the GPU EIR mitigation measures Haz-4.2 and Haz-4.3. The project would be consistent with the GPU EIR mitigation measure Haz-4.3 for compliance with the Building and Fire Code and the project has incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a project design feature. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. As stated in response 10(f), the Hydraulic Study concluded the project would not alter existing drainage patterns onsite in a manner which would result in flooding on or offsite. The basins would be adequately sized to attenuate post-project peak flow rates in the event a 100-year storm event would occur. In addition, as stated in responses 10(i) and 10(j), the project is not located within a 100-year flood hazard area, floodway, or floodplain and would not be impacted from downstream flooding. Further, as concluded in 7(a)(IV), although the site is located within a landslide susceptibility area per County GIS, the project would be required to prepare a geotechnical report prior to ground disturbance activities as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction. In addition, the project would not develop any steep slopes. The project only has one interface to undeveloped land (west). This area is maintained in accordance with the County of San Diego Defensible Space Ordinance. The project site will not have any structures within 90 feet of the property line on the east site. According to the Fire Protection Plan, the combination of building construction, lack of fuels in the interface and overall lack of continuous wildland fuels in the upwind area, produce a defensible space which is more than adequate to protect the project site in the event of a wildfire in the adjacent properties. Therefore, the project would not expose people or structures to a significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the project would have a less than significant impact with the incorporation of GPU EIR mitigation measures Haz-4.2 and Haz-4.3 as well as a required geotechnical report. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations, and Existing Regulatory Processes, Liquefaction. Haz-4.3 requires compliance with the Building and Fire Code and the project has incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush

management as a project design feature. Therefore, the project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

The GPU EIR concluded significant and unavoidable impacts associated with wildfire under Section 2.7, Hazards and Hazardous Materials. Based on the project Fire Protection Plan, and the incorporation of project design features and mitigation measures, impacts associated with wildfire would be less than significant. Therefore, the project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Therefore, with regards to the issue area of Wildfire, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Haz-4.2 and Haz 4.3), as well as a Geotechnical Report described above, would be applied to the project. These mitigation measures, as detailed above, requires the project applicant to implement brush management and comply with the building and fire codes.

Appendices

Appendix A – References

Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

Appendix A

The following is the list of project specific technical studies used to support the project's environmental analysis. All technical studies are available on the website here https://www.sandiegocounty.gov/content/sdc/pds/Current_Projects.html#par_title or hard copies are available at the County of San Diego Zoning Counter, 5510 Overland Avenue, Suite 110, San Diego, 92123:

Begnell, Gene; Firesafe Planning Solutions, (March 10, 2021), Fire Protection Plan – Letter Report, 38435 Lizard Rocks Road, Valley Center, CA 92082

Castells, Justin; PaleoWest, (January 2021), Historic Resources Study for the Green Storage Valley Expansion Project, San Diego County, California; PDS2020-STP-03-026W1

Castells, Shelby; Red Tail Environmental, (January 2021), Cultural Resources Study for the Green Storage Valley Expansion Project, San Diego County, California; PDS2020-STP-03-026W1

Cooke, Gregory; DRC Engineering Inc., (May 27, 2021), Drainage Study for GS Valley Expansion, 28435 Lizard Rocks Road, Valley Center, California 92082 (in unincorporated area of San Diego County)

Cooke, Gregory; DRC Engineering Inc., (May 27, 2021), County of San Diego Stormwater Quality Management Plan (SWQMP) For Priority Development Projects (PDPs)

Darnell, Billy; Darnell & Associates, (January 21, 2020), Traffic Analysis for Greens Storage Valley Project located at 24835 Lizard Rocks Road in the Valley Center area of San Diego County. APN#188-250-15

Hool, Amy; Eilar Associates, Inc. (February 17, 2021), Focused Noise Analysis Green Storage Valley Center Expansion, San Diego County Record ID: PDS2020-STP-03-026W1

Louden, Jeremy; Ldn Consulting, Inc. (March 5, 2021), Air Quality Assessment, Green Storage Valley Center Expansion, PDS2019-IC-19-002, Valley Center CA

Louden, Jeremy; Ldn Consulting, Inc. (March 5, 2021), Green Storage Valley Center Expansion Greenhouse Gas Screening Letter – San Diego County

Scheidt, Vincent; (January 2021), Summary Biology Report, Biological Resources, Project Impacts, and Mitigation, The Greens Storage Valley Center Expansion Project, APN 188-250-41 & 188-250-15, Valley Center, PDS2020-STP-03-026W1

References

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at:

http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf

Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:

http://www.sdcountry.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf